

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JUDY VUONG, Plaintiff,	)	
	)	
v.	)	Civil Action No. 4:22-cv-01823
	)	
	)	
DENIS MCDONOUGH, Secretary of	)	
Veterans Affairs,	)	JURY DEMANDED
Defendant.	)	
	)	

**PLAINTIFF JUDY VUONG'S  
DISCLOSURE OF EXPERT TESTMONY**

COMES NOW, Plaintiff in the above-entitled and numbered cause of action, and files his Disclosure of Expert Testimony. Further, this designation will serve as supplementation to all Disclosures, Answers to Interrogatories and Responses to Requests for Production. Pursuant to the Scheduling Order for this matter, Plaintiff respectfully asks the Court to accept her disclosure of expert testimony as follows:

Plaintiff, Designates Ian Scharfman to testify as an expert in accordance with F.R.C.P. 26(a)(2). Mr. Scharfman will testify regarding the reasonableness and necessity of attorneys' fees, in this case, that have been incurred by Plaintiff and to controvert any attorneys' fees sought to be recovered by Defendant. Any necessary report, curriculum vitae, and testifying history will be produced to Defendants.

Plaintiff also designates the following treating physician to testify as an expert in accordance with F.R.C.P. 26(a)(2) on the issue of Plaintiff's mental anguish, physical health, and expenses, Plaintiff designates:

**Dr. William Land**

3811 Valley Centre Dr.  
San Diego, CA 92130  
(858) 764-3320

Dr. Land is a health care provider with knowledge of the effects that such workplace misconduct has had on Plaintiff. Dr. Land is a non-retained expert. Dr. Land is a treating healthcare professional for Plaintiff. Dr. Land will testify regarding his treatment of Plaintiff, as well as the procedures and protocol used in treating Plaintiff and gathering evidence related to Plaintiff's claims. Dr. Land also has knowledge of the medical conditions of Plaintiff at the heart of this litigation and the effects and cost that the misconduct has/had on Plaintiff. Dr. Land's opinions are contained within his records, to the extent he maintains records.

Plaintiff reserves the right to call any expert designated by Defendant or called by Defendant at hearing or trial.

Plaintiff reserves the right to solicit testimony from any witness, lay or otherwise, who may have relevant opinions within the realms of their expertise.

May 1, 2023

Respectfully submitted,

By: /s/ Ashok Bail  
ASHOK BAIL  
STATE BAR #24043541

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### **CERTIFICATE OF SERVICE**

On May 1, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

By: /s/ Ashok Bail  
Ashok Bail